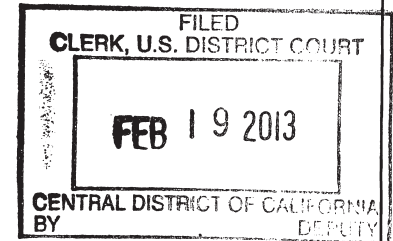


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Attorney for Plaintiff  
Chao Tai Electronics Co., Ltd.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CHAO TAI ELECTRONICS CO.,	)	Case No.: No. CV-12-10137-R-MRW
LTD., a Taiwanese corporation,	)	
	)	
Plaintiff,	)	FIRST AMENDED COMPLAINT
	)	FOR PATENT INFRINGEMENT
vs.	)	
	)	
LEDUP ENTERPRISE, INC., a	)	
California corporation; LOWE'S HIW,	)	
INC., a Washington Corporation; THE	)	
HOME DEPOT U.S.A., INC., a	)	
Delaware corporation; MARTHA	)	REQUEST FOR JURY TRIAL
STEWART LIVING OMNIMEDIA,	)	
INC., a Delaware corporation; and	)	
DOES 1 through 10, inclusive,	)	
	)	
Defendants.	)	

Plaintiff, Chao Tai Electronics Co., LTD., brings this cause of action against Defendants, Ledup Enterprises, Inc., Lowe's HIW, Inc., The Home Depot, U.S.A., Inc., and Martha Stewart Living Omnimedia, Inc., and respectfully alleges as follows:

**Jurisdiction and Venue**

1  
2  
3 1. This cause of action arises under the Patent Laws of the United States 35  
4 U.S.C., Title 28, §§ 1, *et seq.*

5 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331  
6 and 1338(a).

7 3. This Court has personal jurisdiction over Ledup Enterprise, Inc.  
8 (hereinafter referred as “Ledup”), because Ledup is a California corporation which  
9 conducts regular business activity within the Central District of California.

10 4. Venue is proper as Ledup has a place of business at 5321 Derry Avenue,  
11 Suite B, Agoura Hills, California within the Central District of California pursuant to  
12 the meaning of 28 U.S.C. §§1391(b)(1), (c) and Ledup has committed acts of  
13 infringement in this district, or has contributed to or induced acts of infringement in  
14 this district under 28 U.S.C. §1391(b)(2) and 28 U.S.C. § 1400.

15 5. The Court has personal jurisdiction over The Home Depot U.S.A., Inc., a  
16 Delaware Corporation, (hereinafter referred as “Home Depot”), because Home Depot  
17 conducts regular business within this district.

18 6. Venue is proper as Home Depot has a place of business within the  
19 Central District of California pursuant to the meaning of 28 U.S.C. §§1391(b)(1), (c)  
20 and Home Depot has committed acts of infringement in this district, or has  
21 contributed to or induced acts of infringement in this district under 28 U.S.C.  
22 §1391(b)(2) and 28 U.S.C. § 1400.

23 7. The Court has personal jurisdiction over Lowe’s Companies HIW, Inc.  
24 (hereinafter referred as “Lowe’s”), because Lowe’s conducts regular business within  
25 the Central District of California.

26 8. Venue is proper as Lowe’s has a place of business within the Central  
27 District of California pursuant to the meaning of 28 U.S.C. §§1391(b)(1), (c) and  
28 Lowe has committed acts of infringement in this district, or has contributed to or

1 induced acts of infringement in this district under 28 U.S.C. §1391(b)(2) and 28  
2 U.S.C. § 1400.

3 9. The Court has personal jurisdiction over Martha Stewart Living  
4 Omnimedia, Inc. (hereinafter referred as “Martha Stewart”), because Martha Stewart  
5 conducts regular business in the Central District of California.

6 10. Venue is proper as Martha Stewart has committed acts of infringement in  
7 this district, or has contributed to or induced acts of infringement in this district under  
8 28 U.S.C. §1391(b)(2) and 28 U.S.C. § 1400.

9  
10 **The Parties**  
11

12 11. Plaintiff Chao Tai is a Taiwan corporation which resides within Taipei,  
13 Taiwan, and has a place of business in Taipei, Taiwan, Republic of China.

14 12. For years Chao Tai has provided festive Christmas lighting to the United  
15 States. The lights are used on Christmas trees and around the house.

16 13. Chao Tai’s products are reliable, cost effective, and utilize very little  
17 power due to the use of light emitting diodes (LEDs), which produce far less heat than  
18 filament type light devices.

19 14. The LED light string devices have become quite popular and have  
20 occupied a significant commercial element of the holiday market.

21 15. Chao Tai has been a pioneer in the development and use of LEDs in light  
22 string devices. Chao Tai has invested in the development of its LED products and the  
23 growth of the LED light string devices market in the United States.

24 16. As a result of this success and innovation, Chao Tai was granted United  
25 States Patent No. 7,301,287 (hereinafter “the ‘287 Patent,”). A true and correct copy  
26 of the ‘287 Patent is attached hereto as Exhibit 1.

27 17. Chao Tai sold the patented LED string devices to Home Depot and  
28 Lowe’s among other customers.

1           18.    Recently, Home Depot, Lowe's, Martha Stewart, and Ledup have been  
2 selling LED light string devices obtained from sources other than Chao Tai that utilize  
3 the technology of the '287 Patent.

4           19.    On or about November 24, 2010 Plaintiff, through its attorney, sent a  
5 letter to Defendant Lowe's demanding Lowe's, among other things, to immediately  
6 cease and desist its acts of infringement of the '287 Patent. A true and correct copy of  
7 such a letter is attached hereto as Exhibit 2.

8           20.    On information and belief, Lowe's has been and still is infringing the  
9 '287 Patent.

10          21.    Chao Tai has been damaged by the introduction of the infringing LED  
11 light strings and the decay of its market share.

12          22.    The Complaint filed on November 28, 2012 identified Lowe's  
13 Companies, Inc., a North Carolina Corporation as a defendant. The Amended  
14 Complaint reflects that Lowe's HIW, Inc., a Washington Corporation, is believed to  
15 be the correct identification of the entity. Lowe's HIW, Inc. received service of  
16 process of the Summons and Complaint on February 1, 2013, within ninety days of  
17 filing the Complaint and within the time limit prescribed by Rule 4(m). The  
18 Amended Complaint asserts a claim for patent infringement that arose out of the  
19 conduct, transaction, or occurrence set out in the original pleading, Lowe's received  
20 such notice of the action and will not be prejudiced in defending on the merits, and  
21 Lowe's knew or should have known that the action would have been brought against  
22 it, but for the identity.

23          23.    The Complaint filed on November 28, 2012 identified The Home Depot,  
24 Inc., a Delaware corporation, as a defendant. The Amended Complaint reflects that  
25 The Home Depot U.S.A., Inc., a Delaware Corporation is believed to be the correct  
26 identification of the entity. Home Depot U.S.A., Inc., received service of process of  
27 the Summons and the Complaint on February 15, 2013, within ninety days of filing  
28 the Complaint and within the time limit prescribed by Rule 4(m). The Amended

1 Complaint asserts a claim for patent infringement that arose out of the conduct,  
2 transaction, or occurrence set out in the original pleading, Home Depot received such  
3 notice of the action and will not be prejudiced in defending on the merits, and Home  
4 Depot knew or should have known that the action would have been brought against it,  
5 but for the identity.

6 24. The true names and capacities, whether individual, corporate, associate  
7 or otherwise of defendants named herein Does 1 through 10, inclusive, are unknown  
8 to Chao Tai at this time. Chao Tai will amend this complaint when the same become  
9 fully ascertained.

10  
11 **CAUSE OF ACTION**

12 **Patent Infringement For U.S. Patent No. 7,301,287**

13 **Against Defendants Ledup, Martha Stewart, Home Depot, and Lowe's**

14  
15 25. Plaintiff re-alleges paragraphs 1 through 24.

16 26. On November 27, 2007, United States Patent No. 7,301,287 (hereinafter  
17 "the '287 Patent,") entitled High Power Light String Device was duly and legally  
18 issued to Chong Ying Lu as inventor. The '287 Patent describes and claims a circuit  
19 for an LED light string.

20 27. Plaintiff Chao Tai Electron Co., Ltd. is the assignee of record, and the  
21 owner by assignment of all of the inventor's and assignor's right, title and interest in  
22 and to the invention of the '287 Patent.

23 28. On May 25, 2011 a third party requested, and ultimately the United  
24 States Patent and Trademark Office ("USPTO") undertook, an ex parte reexamination  
25 of the '287 Patent.

26 29. The '287 Patent successfully reissued from the USPTO with no changes  
27 to the claims. The Ex Parte Reexamination Certificate from the USPTO stated that,  
28 "The patentability of claims 1-8 is confirmed." (Exhibit 1).



1           30.    The ‘287 Patent is valid and enforceable.

2           31.    Martha Stewart sells a high power light string device for Christmas  
3 decoration marketed as the, “50-LED C-3 Light Bulbs”, Model # 59005H0.

4           32.    The Martha Stewart, “50-LED C-3 Light Bulbs” infringes the ‘287  
5 Patent.

6           33.    The Martha Stewart, “50-LED C-3 Light Bulbs” are sold through Home  
7 Depot.

8           34.    Upon information and belief Martha Stewart sells other high power light  
9 string devices that infringe the ‘287 Patent through Home Depot.

10          35.    Upon information and belief, Defendant Ledup manufactures light string  
11 devices in China that are then private labeled and sold in the United States. Upon  
12 information and belief, one of the private labels is Martha Stewart and in particular  
13 the 50-Light Red and White Mini Light Set.

14          36.    Upon information and belief, Defendant Ledup also sells the same 50-  
15 Light Red and White Mini Light Set without the Martha Stewart private label that  
16 infringes the ‘287 Patent in the United States.

17          37.    Upon information and belief, Defendant Ledup sells other high power  
18 light string devices in the United States that infringe the ‘287 Patent.

19          38.    Defendant Lowe’s has sold a product known as the “50 LED C-5 lights”  
20 that infringes the ‘287 Patent.

21          39.    Upon information and belief, Lowe’s has sold other high power light  
22 string devices in the United States that infringe the ‘287 Patent.

23          40.    Defendants Martha Stewart, Home Depot, Ledup, and Lowe’s have been,  
24 and still are, infringing the ‘287 Patent by making, importing, distributing, selling,  
25 offering for sale and using systems and components embodying the patented  
26 invention, and will continue to do so unless enjoined by this Court.  
27  
28

41. On information and belief, Defendants Martha Stewart, Home Depot, Ledup, and Lowe's have acted willfully, knowingly and deliberately with full knowledge of Plaintiff's patent rights and in the absence of any good faith basis for a belief of non-infringement or invalidity of Plaintiff's '287 Patent.

WHEREFORE, Plaintiff prays that this Court:

1. Enter judgment that Plaintiff's U.S. Letters Patent 7,301,287 is valid and enforceable and has been infringed by Defendants Martha Stewart, Home Depot, Ledup, and Lowe's;

2. Issue a preliminary and final injunction against continued infringement by Defendants;

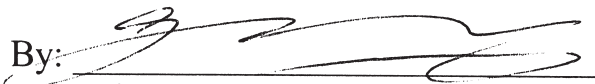
3. Award Plaintiff damages adequate to compensate for the infringement, but in no event less than a reasonable royalty for the use made of the invention by the Defendants, as provided in 35 U.S.C. §284, together with interest and costs to be determined by the Court;

4. Treble the amount of Plaintiff's damages pursuant to the provisions of 35 U.S.C. §284 by reason of willful infringement;

5. Determine that this is an exceptional case pursuant to 35 U.S.C. §285, and award reasonable attorneys fees to the Plaintiff;

6. Award such further relief as the Court may deem just and proper.

Date: 2/19/2013

By: 

Gary F. Wang  
LAW OFFICES OF GARY F. WANG  
Attorneys for Plaintiff  
Chao Tai Electronics Co., LTD.

**REQUEST FOR JURY TRIAL**

Plaintiff hereby Requests trial by jury on all issues triable to a jury.

Date: 2/19/2013

By: 

Gary F. Wang  
LAW OFFICES OF GARY F. WANG  
Attorneys for Plaintiff  
Chao Tai Electronics Co., LTD.



## **Exhibit 1**

US007301287B1

(12) **United States Patent**  
**Lu**

(10) **Patent No.:** **US 7,301,287 B1**  
(45) **Date of Patent:** **Nov. 27, 2007**

(54) **HIGH POWER LIGHT STRING DEVICE**

(75) Inventor: **Chong Ying Lu**, Miao-Li Hsien (TW)

(73) Assignee: **Wang Loong Co., Ltd.**, Miao-Li Hsien (TW)

(\*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

(21) Appl. No.: **11/624,233**

(22) Filed: **Jan. 18, 2007**

(51) **Int. Cl.**  
**H05B 37/00** (2006.01)

(52) **U.S. Cl.** ..... **315/185 R**; 315/185 S; 315/51; 362/640; 362/265; 362/800; 362/653

(58) **Field of Classification Search** ..... 315/185 R, 315/185 S, 51, 169.1, 169.3; 362/226, 227, 362/240, 257, 249, 265, 653, 654, 545, 640, 362/800

See application file for complete search history.

(56) **References Cited**

U.S. PATENT DOCUMENTS

4,675,575 A \* 6/1987 Smith et al. .... 315/185 S

6,072,280 A \* 6/2000 Allen ..... 315/185 S  
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2007/0008721 A1 \* 1/2007 Peng et al. .... 362/227

\* cited by examiner

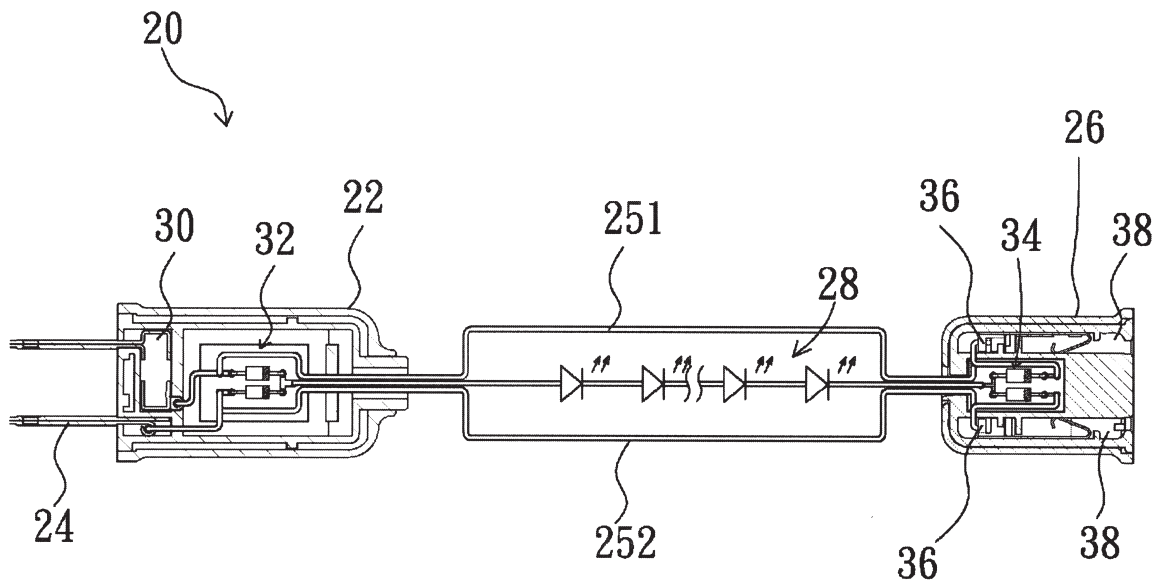
*Primary Examiner*—Haissa Philogene

(74) *Attorney, Agent, or Firm*—Ming Chow; Sinorica, LLC

(57) **ABSTRACT**

A high power light string device comprises a plug with a plug blade set, a tail receptacle, and at least an LED string, wherein a first power adaptor disposed in the plug converts an AC voltage through the plug blade set to a high DC voltage, and a second power adaptor disposed in the tail receptacle converts the AC voltage through the plug blade set to a low DC voltage. Two ends of the LED string are respectively connected to the first and second power adaptors to receive the high and lower DC voltages so that the LED string is turned on to emit light. The power adaptors are directly disposed respectively in the plug and the tail receptacle to simplify the whole light string device so as to enhance the decorating effect of the light string device.

**8 Claims, 3 Drawing Sheets**



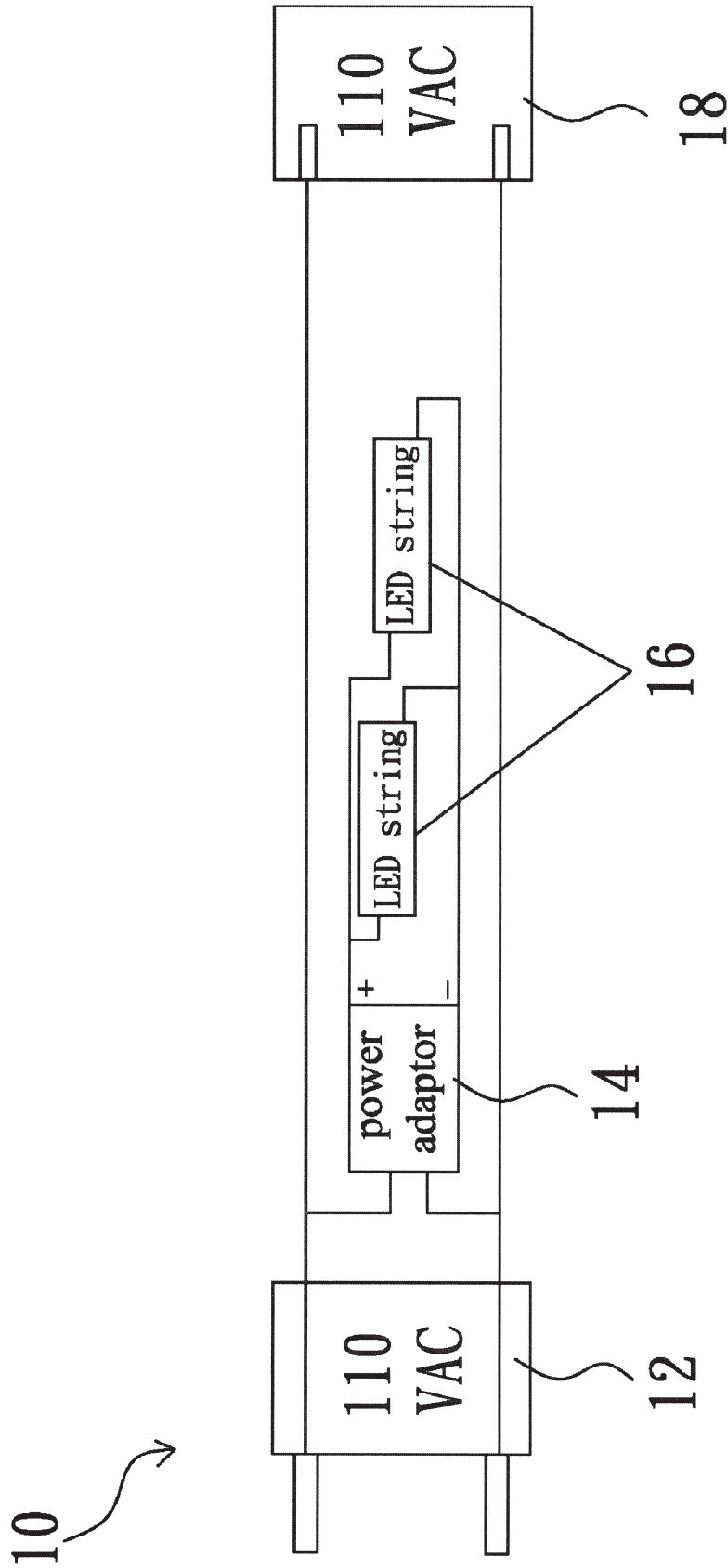


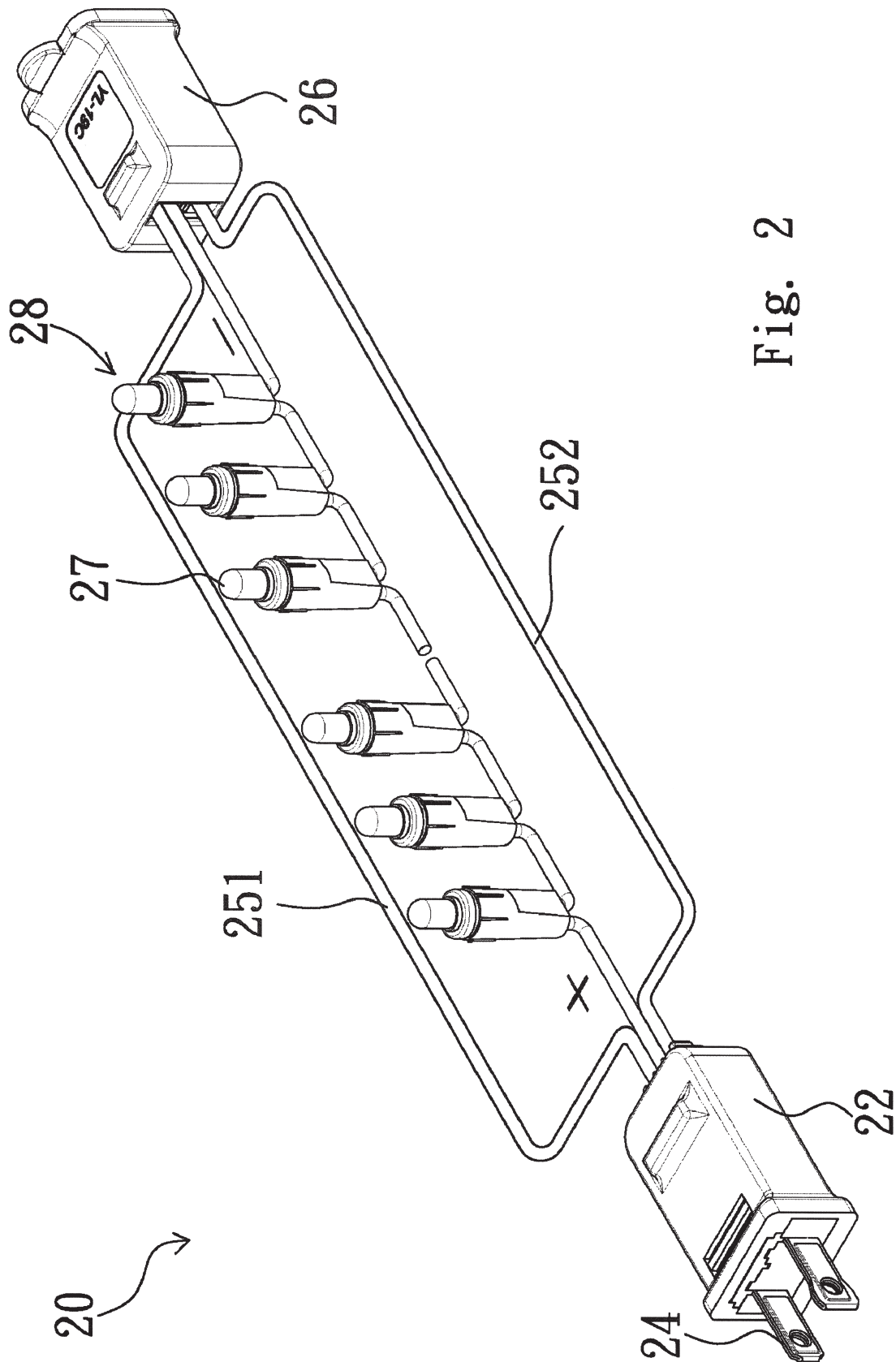
Fig. 1  
(Prior Art)

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Sheet 2 of 3

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Sheet 3 of 3

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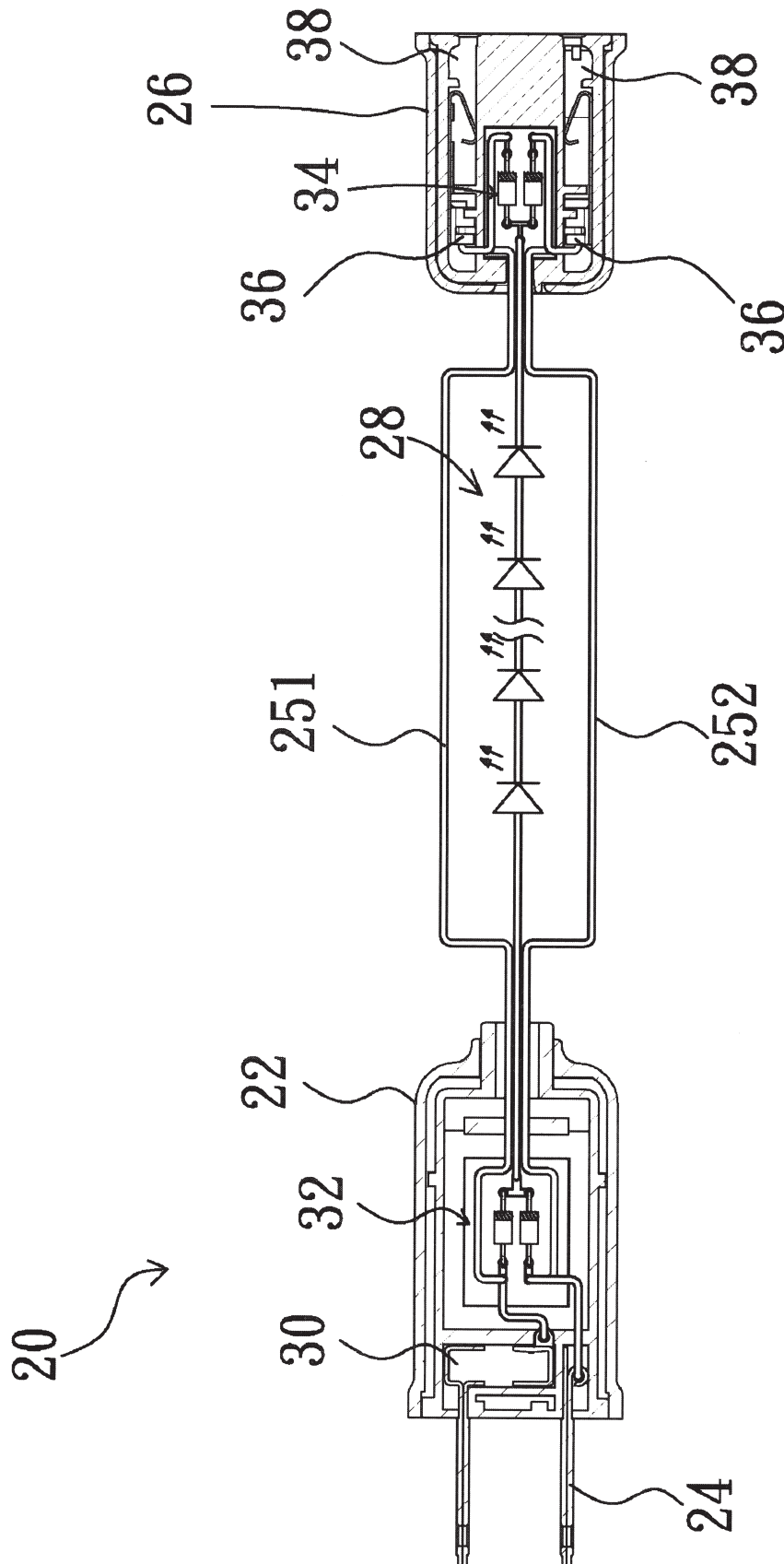


Fig. 3

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1

**HIGH POWER LIGHT STRING DEVICE****BACKGROUND OF THE INVENTION****1. Field of the Invention**

The present invention relates to a high power light string device and, more particularly, to a light string device composed of LEDs.

**2. Description of Related Art**

Light emitting diodes (LEDs) have the characteristics of small size, low power consumption, long lifetime, fast response, and luminescence. Moreover, LEDs are recycled to meet the requirement of environmental protection, and cause no problem of mercury pollution to the environment as general fluorescent lights. Besides, LEDs are driven by DC power and thus are easily controlled to reduce the complexity in circuit design. Therefore, LEDs have been widely applied in various kinds of electronic products.

As shown in FIG. 1, U.S. Pat. No. 6,830,358 discloses an LED string device 10, which is commonly used as a decoration light string in several situations such as the Christmas to enhance the festive mood. In FIG. 1, the LED string device 10 comprises a plug 12, a power adaptor 14, two LED strings 16 and a tail receptacle 18. The plug 12 is externally connected to the power adaptor 14 to convert an AC voltage to a DC voltage that is sent to the two LED strings 16. The tail receptacle 18 can be plugged by another plug. However, because the power adaptor 14 has a certain volume, the delicacy of the whole LED string device is usually destroyed.

Accordingly, the present invention provides a more perfect light string device to solve the above problems in the prior art.

**SUMMARY OF THE INVENTION**

An object of the present invention is to provide a high power light string device that two power adaptors are respectively disposed in a plug and a tail receptacle to simplify the whole light string device so as to enhance the decorating effect and prevent from destroying the delicacy of the whole light string device.

Another object of the present invention is to provide a high power light string device, which makes use of a plurality of LEDs to form a light string structure with high efficiency and power saving.

To achieve the above objects, the present invention provides a high power light string device, which comprises a plug, a tail receptacle, and at least an LED string. The plug has a plug blade set and a first power adaptor. The first power adaptor converts an AC voltage through the plug blade set to a high DC voltage. The tail receptacle has a conducting-strip set and a second power adaptor. The second power adaptor converts the AC voltage through the plug blade set to a low DC voltage. One end of the LED string is connected to the first power adaptor to receive the high DC voltage, and the other end of the LED string is connected to the second power adaptor to receive the low DC voltage so that the LED string is turned on to emit light.

**BRIEF DESCRIPTION OF THE DRAWINGS**

The various objects and advantages of the present invention will be more readily understood from the following detailed description when read in conjunction with the appended drawing, in which:

FIG. 1 is a diagram of a conventional LED string device;

2

FIG. 2 is a perspective view of the present invention; and  
FIG. 3 is an internal structure diagram of the present invention.

**DETAILED DESCRIPTION OF THE  
PREFERRED EMBODIMENTS**

A high power light string device 20 in accordance with the present invention is illustrated in FIG. 2. The high power light string device 20 comprises a plug 22, a tail receptacle 26, and an LED string 28. The plug 22 is made of plastic material, and has a plug blade set 24 with two plug blades. The tail receptacle 26 is made of plastic material, and is electrically connected to the plug 22 and the plug blade set 24 via electric wires 251 and 252. The plug 22 and the tail receptacle 26 are driven by the same voltage such as 110 V or 220 V. The LED string 28 is composed of a plurality of LEDs 27. Two ends of the LED string 28 are respectively electrically connected to the plug 22 and the tail receptacle 26.

As shown in FIG. 3, a fuse component 30 and a power adaptor 32 are disposed in the plug 22. Two ends of the fuse component 30 are respectively electrically connected to the plug blade set 24 and the power adaptor 32 to protect the circuit from the influence of over-current events. The power adaptor 32 converts an AC voltage through the plug blade set 24 to a high DC voltage. Another power adaptor 34 and a conducting-strip set 36 are disposed in the tail receptacle 26. The power adaptor 34 receives the AC voltage, such as 110 V or 220 V, through the plug blade set 24 via the electric wires 251 and 252 to convert this AC voltage to a low DC voltage. The conducting-strip set 36 is electrically connected to the power adaptor 34 and the plug blade set 24. The tail receptacle 26 has two slots 38 so that a plug blade set of a plug of another light string device with the same structure can be inserted therein to achieve electric connection with the conducting-strip set 36. Moreover, one end of the LED string 28 is connected to the power adaptor 32 to receive the high DC voltage, and the other end is connected to the power adaptor 34 to receive the low DC voltage so that the LED string 28 is turned on to emit light. Each LED of the LED string 28 is selected among a white LED, a red LED, a blue LED, a green LED, a yellow LED, or a LED of another color.

To sum up, in the high power light string device of the present invention, two power adaptors are respectively disposed in a plug and a tail receptacle to simplify the whole light string device so as to enhance the decorating effect and prevent from destroying the delicacy of the whole light string device.

Although the present invention has been described with reference to the preferred embodiment thereof, it will be understood that the invention is not limited to the details thereof. Various substitutions and modifications have been suggested in the foregoing description, and other will occur to those of ordinary skill in the art. Therefore, all such substitutions and modifications are intended to be embraced within the scope of the invention as defined in the appended claims.

I claim:

1. A high power light string device comprising:
  - a plug having a first plug blade set and a first power adaptor, wherein said first power adaptor is disposed in said plug to convert an AC voltage through said first plug blade set to a high DC voltage;
  - a tail receptacle having a conducting strip set and a second power adaptor disposed interiorly, said second power



## US 7,301,287 B1

3

adaptor converting said AC voltage through said first plug blade set to a low DC voltage; and  
 at least an LED string having a first end and a second end, said first end being connected to said first power adaptor to receive said high DC voltage and said second end being connected to said second power adaptor to receive said low DC voltage so that said LED string is turned on to emit light.

2. The high power light string device as claimed in claim 1, wherein said conducting-strip set is electrically plugged by a second plug blade set of a second plug.

3. The high power light string device as claimed in claim 1, wherein said conducting-strip set is electrically connected to said second power adaptor.

4. The high power light string device as claimed in claim 1, wherein said conducting-strip set is electrically connected to said first plug blade set.

4

5. The high power light string device as claimed in claim 1, wherein said plug and said tail receptacle are driven at the same voltage.

6. The high power light string device as claimed in claim 1, wherein a fuse component is further disposed in said plug, and said fuse component is electrically connected to said first power adaptor and said first plug blade set.

7. The high power light string device as claimed in claim 1, wherein said plug and said tail receptacle are made of plastic material.

8. The high power light string device as claimed in claim 1, wherein each LED of said LED string is selected among a white LED, a red LED, a blue LED, a green LED, a yellow LED, and a LED of another color.

\* \* \* \* \*

US007301287C1

(12) **EX PARTE REEXAMINATION CERTIFICATE** (9073rd)  
**United States Patent**  
**Lu**

(10) **Number:** **US 7,301,287 C1**(45) **Certificate Issued:** **Jun. 12, 2012**(54) **HIGH POWER LIGHT STRING DEVICE**(75) Inventor: **Chong Ying Lu**, Miao-Li Hsien (TW)(73) Assignee: **Chao Tai Electron Co. Ltd.**, Kaohsiung (TW)**Reexamination Request:**

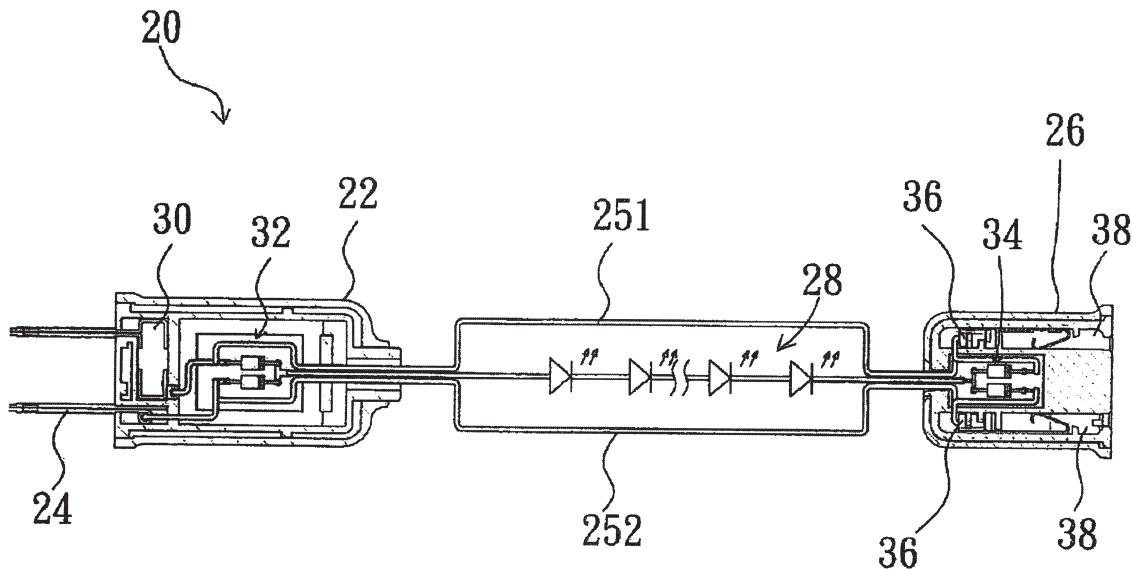
No. 90/011,711, Jun. 27, 2011

**Reexamination Certificate for:**Patent No.: **7,301,287**Issued: **Nov. 27, 2007**Appl. No.: **11/624,233**Filed: **Jan. 18, 2007**(51) **Int. Cl.****H05B 37/00** (2006.01)**H05B 39/00** (2006.01)**H05B 41/00** (2006.01)(52) **U.S. Cl.** ..... **315/185 R; 315/51; 362/640; 362/265; 362/800; 362/653**(58) **Field of Classification Search** ..... None  
See application file for complete search history.(56) **References Cited**

To view the complete listing of prior art documents cited during the proceeding for Reexamination Control Number 90/011,711, please refer to the USPTO's public Patent Application Information Retrieval (PAIR) system under the Display References tab.

*Primary Examiner*—John Heyman(57) **ABSTRACT**

A high power light string device comprises a plug with a plug blade set, a tail receptacle, and at least an LED string, wherein a first power adaptor disposed in the plug converts an AC voltage through the plug blade set to a high DC voltage, and a second power adaptor disposed in the tail receptacle converts the AC voltage through the plug blade set to a low DC voltage. Two ends of the LED string are respectively connected to the first and second power adaptors to receive the high and lower DC voltages so that the LED string is turned on to emit light. The power adaptors are directly disposed respectively in the plug and the tail receptacle to simplify the whole light string device so as to enhance the decorating effect of the light string device.



US 7,301,287 C1

**1**  
**EX PARTE**  
**REEXAMINATION CERTIFICATE**  
**ISSUED UNDER 35 U.S.C. 307**

NO AMENDMENTS HAVE BEEN MADE TO  
THE PATENT

**2**  
AS A RESULT OF REEXAMINATION, IT HAS BEEN  
DETERMINED THAT:

5 The patentability of claims **1-8** is confirmed.

\* \* \* \* \*

## **Exhibit 2**

# Tai E International Patent & Law Office

9F, 112 Section 2, Chang-An East Road  
Taipei 104, Taiwan, R.O.C.  
P.O. Box 46-478, Taipei 104, Taiwan, R.O.C.

Tel: 886-2-25061023, 25081531  
Fax: 886-2-25068147, 25076571, 25064319, 25090804  
URL: <http://www.taie.com.tw>  
E-mail: [86026@taie.com.tw](mailto:86026@taie.com.tw)

By fax Page(s) including this page

November 24, 2009

## VIA EXPRESS MAIL

Lowe's Companies, Inc.  
P.O. Box 1111 North Wilkesboro,  
NC 28656  
U.S.A.

Attn. The Chief Executive Officer

Re: A Notification of the U.S. Patent No. 7,301,287 B1 "High Power Light String  
Device" in the name of Wang Loong Co., Ltd. (Taiwan)  
Our Ref: CFL-10611

Dear Sir,

Our firm represents Chao Tai Electron Co., Ltd. (hereinafter called Chao Tai) located in Kaohsiung City, Taiwan, R.O.C. Chao Tai is the assignee of Wang Loong Co., Ltd. for the U.S. Patent No. 7,301,287 B1 "High Power Light String Device" (the Patent). Photocopies of the drawings consisted in the patent application and the notice of recordation of assignment document of the Patent from USPTO are enclosed herewith for your reference.

Chao Tai has put the Patent into practice. The business of the patented product has proven to be a commercial success to our client. Chao Tai highly cherishes the commercial value of the Patent, and will enforce its patent right against any infringer by taking proper legal action available under the law.

It came to our client's attention that you are going to sell, or to cause to be sold, certain sockets used in Christmas light string in the United States, which are imported by G.E. from China for selling, such as one bearing TS and Lu serial indication. By a preliminary examination of a sample of your product, our client found that it is remarkably related in appearance as well as in its circuitry to the Patented product.

We recently contacted General Electric Co. regarding this situation and requested that it paid a special attention to '732 Patent. General Electric has been, and remains, unresponsive despite our demand for a comment. Given this situation Chao Tai has little choice but to also separate cautionary notices to General Electric's distribution partners, such as yourself.

For fear that your company shall incur a risk of litigation for dealing with patented products or engaging in improper investment due to your ignorance of our client's patent protection, we hereby inform you as above. You are welcome to contact us if you are interested in dealing with the patented products of our client.

If you have any question or comment on the contents of this letter, you are welcome to contact our firm or Chao Tai directly as soon as possible. Otherwise we would appreciate receiving your timely confirmation before December 7, 2009 to respect our client's legally protected patent right.

With best regard,

Fan-Jiuan Wei (Miss), Esq.

Henry Guei, Esq.

Encls.